

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

:
: Chapter 11
:
: Case No. 08-13555 (JMP)
:
: Jointly Administered
:

**ORDER ON MOTION OF GIANTS STADIUM LLC FOR LEAVE
TO CONDUCT DISCOVERY OF THE DEBTORS PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004**

Upon the motion (the “Motion”) of Giants Stadium LLC (“Giants Stadium”) for the entry of an order pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (“Rule 2004”) authorizing and directing (i) the production of documents by Lehman Brothers Holdings Inc. and Lehman Brothers Special Financing Inc. (collectively, the “Debtors”) in response to the document requests attached as Schedule 1 to the Motion; (ii) the deposition of a representative of the Debtors who is most knowledgeable about the matters set forth in the Motion, and (iii) the issuance of one or more subpoenas compelling such document production and attendance at such deposition; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(B); and upon consideration of the Motion; and due and appropriate notice of the Motion having been given, it is hereby **ORDERED** that:

1. The Motion is GRANTED.
2. Giants Stadium is authorized to serve upon the Debtors document requests substantially in the form of Schedule 1 to the Motion. The Debtors shall produce such requested documents so that such documents are received at the offices of Sullivan &

Cromwell LLP, located at 125 Broad Street, New York, New York 10004, on or before _____, 2011, or at such other date, time, or place as Giants Stadium may agree.

3. The Debtors shall make their representative most knowledgeable with regard to the subject matters set forth in the Motion available for a deposition by Giants Stadium on _____, 2011, commencing at _____ a.m. (prevailing Eastern Time), at the offices of Sullivan & Cromwell LLP, located at 125 Broad Street, New York, New York 10004, or at such other date, time, or place as Giants Stadium may agree.

4. Giants Stadium is authorized to issue subpoenas, pursuant to Federal Rule of Bankruptcy Procedure 9016, as necessary for the above-ordered document production and deposition.

Dated: _____, 2011
New York, New York

THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE